

MA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

NOT  
**FILED**

JUN 24 2013  
JUN 24 2013  
THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Angela M. Brown

Honorable Judge John J. Tharp, Jr.

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Case No: 13 CV 2597  
(To be supplied by the Clerk of this Court)

Chicago Municipal Employees  
Credit Union and City of  
Chicago Comptroller's  
Office

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

CHECK ONE ONLY:

AMENDED COMPLAINT

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

**I. Plaintiff(s):**

- A. Name: Angela M. Brown
- B. List all aliases: \_\_\_\_\_
- C. Prisoner identification number: \_\_\_\_\_
- D. Place of present confinement: \_\_\_\_\_
- E. Address: \_\_\_\_\_

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: Chicago Municipal Employees Credit Union  
Title: and City of Chicago Comptroller's Office  
Place of Employment: \_\_\_\_\_
- B. Defendant: \_\_\_\_\_  
Title: \_\_\_\_\_  
Place of Employment: \_\_\_\_\_
- C. Defendant: \_\_\_\_\_  
Title: \_\_\_\_\_  
Place of Employment: \_\_\_\_\_

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: 13 CV 2597
- B. Approximate date of filing lawsuit: \_\_\_\_\_
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- D. List all defendants: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): \_\_\_\_\_
- F. Name of judge to whom case was assigned: \_\_\_\_\_  
\_\_\_\_\_
- G. Basic claim made: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- I. Approximate date of disposition: \_\_\_\_\_

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

#### IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

- 1) I am in need of the court assistance in obtaining money back from both Chicago Municipal Employees Credit Union and the Comptroller's Office for the City of Chicago. In 2003 an employee at the Chicago Municipal Employees Credit Union, named Tiffeny called and offered me a \$2500. signature loan, and \$20,000. on an auto loan. My credit was so bad, that I did not qualify for a loan, so I said thank you, but no thank you. A little time passed, and I called Tiffeny to take her up on her offer. I took out a \$2500. signature loan. After I received that loan, in 2004 I asked Tiffeny about the auto loan. She changed that amount from \$20,000. to only saying that I could have \$10,000. Car loan. I had to call City Finance Department for more than a year about the signature loan. The loan has been paid in full, but City Finance refused to stop sending the Credit Union the money. I had the same

2) problem with the auto loan.  
 I called City Comptroller's Office and spoke with Farida Khan. I asked her for a copy of the payments they sent to the Credit Union from 2003 to 2008. Ms. Khan said that I could only have the payment history for 2008. When I received the payment history from Ms. Khan it show all the payments and over payments for the signature loan. However it only show the first year of payments for the auto loan I took out in 2004.

Jan. 2013 I went back to the City Comptroller's Office and asked for the printout of each years they sent payments to the Credit Union. That history report omit the first 2 1/2 years that the City Comptroller's deducted payments from my paycheck.

The Credit Union took money from me for both loans. They also charge me late fees even though my credit report shows that I had never been late with any of my payments for the signature loan. I stopped the payroll deduction in October 2005 to

3) April 2007.

I spoke with Michelle Vargas the lady over the Credit Union. I told her that the Signature loan I took out in 2003 had been paid off more than a year ago. I also mentioned that the Credit Union has been charging me late fees, even though I have not been late with my payments. Ms. Vargas said that we only charge you five late fees, and if she (Credit Union) owes me any money, and I hadn't received it in a timely manner, then I could not have it. I said to her that I was charged eight late fees. Ms. Vargas also said that I have \$800. in my Share account. She said she would take \$500. and pay off the signature loan, and she would leave me \$300. I told her again the loan has been paid off more than a year ago, but she still took the \$500. from my account. This occurred in October 2005. I also closed the two Share account that I had with the Credit Union.

4) April 2007. I had to make 18 payments myself for the auto loan. In May 2007, I restarted my payroll deduction to the Credit Union.

The City gave a portion of my pension to the Credit Union \$5,886.45.

The Credit Union loan me \$12,500. I have paid over \$26,000. to them and I still have not received the title to my car. My account with the Credit Union ~~have~~ remain open because according to them I still owe the auto loan.

I have come to the conclusion that the Credit Union, called and offered me, a person with bad credit two loans, just to steal from me. City Finance Department acted in concern with Chicago Municipal Employee's Credit Union to steal money from me by omitting payments I made through payroll deduction for 5 years.

Sincerely,

Angela M. Brown

Angela M. Brown

**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Obtaining money back from both Chicago Municipal  
Employees Credit Union and the Comptroller's Office  
for the City of Chicago

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 24 day of June, 2013

Angela M. Brown  
(Signature of plaintiff or plaintiffs)

Angela M. Brown  
(Print name)

\_\_\_\_\_  
(I.D. Number)

12812 S. Loomis Calumet Park, IL 60827  
(Address)